

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

<b>JUDICIAL WATCH, INC., et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>1:12-cv-800-WTL-TAB</b>
	)	
<b>J. BRADLEY KING, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION FOR SUMMARY JUDGMENT**

The defendants, by counsel, and by Rule 56 of the Federal Rules of Civil Procedure respectfully move for summary judgment in this case. In support of this motion, the defendants state as follows:

1. There are no contested issues of material fact in this case.
2. The defendants are entitled to judgment as a matter of law.
3. In further support of this motion, the defendants rely on the following:
  - a. Defendants Trent Deckard and J. Bradley King's Answers to Plaintiffs' First Set of Interrogatories as **Exhibit 1**.
  - b. Excerpts from transcript of deposition of J. Bradley King, May 30, 2013, as **Exhibit 2**.
  - c. Excerpt from transcript of deposition of Trent R. Deckard, May 29, 2013, as **Exhibit 3**.
  - d. Excerpts from transcript of deposition of Terrence Coleman, May 28, 2013, as **Exhibit 4**.
  - e. Excerpts from transcript of deposition of Francisco Fotia, May 28, 2013, as

**Exhibit 5.**

- f. Excerpt from transcript of deposition of Sarah Redman, May 20, 2013, as

**Exhibit 6.**

- g. “Report on the Quality of the Voter Registration Database in the State of Indiana, Relative to Other States’ Databases,” by Eitan D. Hersh, Assistant Professor, Department of Political Science, Yale University, as **Exhibit 7.**
- h. The plaintiffs’ Complaint (Dkt. 1), previously filed on June 11, 2012.
- i. Judicial Watch letter dated February 9, 2012 (Dkt. 21-1), previously filed on August 2, 2012.
- j. A memorandum in support of this motion, filed contemporaneously with this motion.

**WHEREFORE**, the defendants respectfully request that summary judgment be entered in their favor, and request all other proper relief.

Respectfully submitted,

GREGORY F. ZOELLER  
Indiana Attorney General  
Attorney No. 1958-98

By: /s/ Jefferson S. Garn  
Jefferson S. Garn  
Deputy Attorney General  
Attorney No. 29921-49

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of October, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

**Paul J. Orfanedes**  
JUDICIAL WATCH, INC.  
[porfanedes@judicialwatch.org](mailto:porfanedes@judicialwatch.org)

**Chris Fedeli**  
JUDICIAL WATCH, INC.  
[cfedeli@judicialwatch.org](mailto:cfedeli@judicialwatch.org)

**David R. Langdon**  
LANGDON LAW LLC  
[dlangdon@langdonlaw.com](mailto:dlangdon@langdonlaw.com)

**Joshua B. Bolinger**  
LANGDON LAW LLC  
[jbolinger@langdonlaw.com](mailto:jbolinger@langdonlaw.com)

/s/ Jefferson S. Garn  
Jefferson S. Garn  
Deputy Attorney General

Office of the Indiana Attorney General  
Indiana Government Center South, 5th Floor  
302 W. Washington Street  
Indianapolis, IN 46204-2770  
Telephone: (317) 232-6292  
Fax: (317) 232-7979  
Email: [jefferson.garn@atg.in.gov](mailto:jefferson.garn@atg.in.gov)